

Title V Update for Redstone Arsenal

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DATE: 27 January 2005

Introduction

CH2M HILL has concluded a project to verify emission sources at Redstone Arsenal (RSA) and to prepare an application package to update RSA's Title V Operating Permit, Facility No. 709-0007. This memorandum outlines the requested additions, deletions, and changes to RSA's Title V permit.

Insignificant Sources

Table 1 contains a list of the insignificant sources at RSA, along with the justification for that determination for each source.

Title V Additions

Application forms are attached for emission sources that need to be added to the facility's Title V permit. These sources include four peak shaving generators that recently were installed at RSA, and a number of boilers that are being added to the Title V Permit because they are now affected sources under 40 *Code of Federal Regulations* (CFR) 63, Subpart DDDDD (Boiler Maximum Achievable Control Technology [MACT]). Application forms also are included for new boilers that were installed recently at RSA. Table 2 contains a list of all the boilers at RSA. These boilers were segregated based on size and fuel, consistent with the Boiler MACT subcategories under which they fall (small liquid and small gaseous fuels). They are also separated according to new versus existing units. Likewise, the application forms for the boilers being added to the Title V permit and boilers for which changes are being requested (see discussion below) are arranged in a similar manner.

Title V Changes

A review of RSA's Title V permit indicated that a number of boilers were permitted incorrectly. The boilers either were inadvertently permitted based on heat output instead of heat input, or were permitted based on incorrect information. Additionally, there are a few boilers that have recently been removed and replaced. Table 3 contains a list of boilers for

which changes are being requested, including an explanation of the reason for the change. Application forms for all of the boilers for which changes are being requested are attached.

Title V Deletions

A number of emission sources that are covered under the existing Title V permit have been decommissioned, demolished, or otherwise removed from service. Tables 4 and 5 contain lists of boilers and tanks, respectively, that should be removed from the Title V permit. The boilers listed in Table 4 are being removed from the Title V permit because the boilers either have been removed from service, or do not exist (never installed), as indicated in Table 4. The storage tanks listed in Table 5 are being removed from the Title V permit because they are categorically insignificant, are insignificant based on emission calculations, they have been removed from service, or are being removed from the permit because they are no longer subject to the New Source Performance Standards in 40 CFR 60, Subpart Kb.

Administrative Changes

Pursuant to ADEM Administrative Code R. 335-3-16-.13(1), RSA requests the following administrative changes to the Title V application:

- The emission point numbers for RSA-95/96, page 93, and RSA-142, page 95, are listed in the emission limitations tables as RSA-13-1. RSA requests that the emission point numbers be changed to RSA-95/96 and RSA-142, respectively.
- RSA also requests that the emission point numbers for the Building 8028 boilers, page 37, be changed from B7579-1 and B7579-2 to B8028-1 and B8028-2, respectively, so that the emission point numbers will correspond with the building number.